

AFFIDAVIT

STATE OF MISSOURI)
) ss
COUNTY OF CLAY)

I, Special Agent (SA) Casey R. Brown, the undersigned complainant, being duly sworn, state that I am a Special Agent of the Federal Bureau of Investigation. I have been an SA with the FBI for approximately 2 years, and am currently assigned to the violent crimes squad. This complaint is based on the following facts:

1) This affidavit is in support of a complaint and arrest warrant for Fanes Romelus, black male, 5'8" 166 lbs, date of birth xx xx, 1973, Social Security Account Number (SSAN) xxx-xx-xxxx.

2) On December 5, 2005, SA Craig Arnold interviewed xxxx, Assistant Manager, Bank of America, 2260 Armour Road, North Kansas City, Missouri. Xxxx advised the following during the interview:

a) On December 5, 2005, while xxxx was working at her teller station, xxx was approached by a male carrying what appeared to be a black semi-automatic handgun. The individual told xxxx to give him xxx money. The individual stated "It's not enough, give me more!" xxxx placed all xxx money from xxx top teller drawer on the top of the counter. The individual took the money and placed it into a backpack. The backpack was black with blue on the side. While loading the backpack, the individual told xxxx not to look at him. Before leaving the bank, the individual stopped at the door and stated "If you call the police I will fuckin' kill you!"

b) xxxx described the robber as a male, 5'8"-5'9", approximately 200 lbs, mid 20's to mid 30's, wearing a black ski mask, black leather jacket, dark pants, black gloves, and carrying a black back pack with blue on the front side. The robber spoke broken English.

3) On December 5, 2005, Officer Terry Bowen of the North Kansas City, Missouri Police Department interviewed employee/customer witnesses xxxx x. xxxx, xxxx x. xxxx, xxxx x. xxxx, xxxx x. xxxx, xxxx x. xxxx, and xxxx xxxx, as part of the

law enforcement response and investigation of the December 5, 2005, robbery of the Bank of America, 2260 Armour Road, North Kansas City, Missouri. Officer Bowen reported the following:

a) xxxx xxxx stated that a young black male in a ski mask and black leather coat, came in the front door, carrying a back pack and a handgun. The black male pointed the gun at xxxx xxxx and in a middle eastern accent ordered xxxx to put all of her teller drawer into his bag. The black male then ran out of the front door, got into a white Pontiac Transport van, and drove off west on Armour Road.

b) xxxx xxxx advised that xxx heard the individual yelling in a middle eastern accent, and went into the southwest break room of the bank for protection. xxxx opened the shades and saw the individual get into a white transport van with plate number 700XYA (MO). xxxx yelled the number to fellow employee xxxx xxxx to record. xxxx wrote the number on a piece of paper, which was given to the Police.

4) On December 5, 2005, SA Michael J. Sanders interviewed xxxx xx. xxxx at her residence, xxxx xxxx xxx, Kansas City, Missouri. xx. xxxx advised the following:

a) xxxx xxxx advised that she is the owner of a white Pontiac Transport SE mini-van, Missouri license xxxx. xxxx xxxx advised that xxx had worked a night shift, and that xxx boyfriend, Fanes Romelus, had stayed at xxx apartment to watch their two children. xxxx xxxx advised that Romelus left the apartment on the morning of December 5, 2005 to take one of their children to school. xxxx xxxx did not know which vehicle Romelus drove, but that Romelus would have been the only one with access to her Pontiac mini-van. xxxx xxxx gave consent to search xxx Pontiac Transport mini-van.

5) On December 5, 2005, your affiant, along with SA David J. Bernal, and SA John D. Heron performed a search of a white Pontiac Transport SE van, Missouri license plate xxxx.

a) Inside of the van, a plastic K-Mart bag was found containing a receipt dated December 5, 2005 at approximately 10:00 am, and a plastic container for a toy hand gun. The inside of the plastic bag was stained by a dark material.

b) Also found in the van was a bottle of black shoe polish, a black and blue child's backpack, and a black knit glove.

6) On December 8, 2005, your affiant interviewed xxxx xxxx at the Bank of America, 2260 Armour Road, North Kansas City, Missouri. xxxx advised the following:

a) xxxx was shown the black and blue backpack recovered in the search of the white Pontiac Transport SE van, Missouri license plate xxxx. xxxx, without prompting, immediately recognized the backpack as the backpack carried by the individual who robbed the Bank of America on December 5, 2005.

7) On December 12, 2005, your affiant interviewed Fanes Romelus at the Kansas City Missouri Police Department, 1125 Locust Street, Kansas City, Missouri. After being advised of his Miranda Rights, and signing a written waiver of these rights, Romelus admitted his involvement in the Bank of America robbery. Romelus also provided a written statement concerning his commission of the Bank of America robbery. Romelus advised the following specifics regarding his commission of the Bank of America robbery:

a) Romelus admitted to purchasing a toy handgun from K-Mart, and using black shoe polish to blacken out the orange plastic parts of the toy handgun.

b) Romelus admitted to having utilized the toy handgun and the black and blue backpack, in order to carry out the Bank of America robbery.

c) Romelus admitted that during the robbery, he was wearing a fake mask, a blue jacket, black pants, and was wearing gloves.

d) Romelus admitted to telling the teller to give him money, and admitted to trying to scare the teller by telling her something like "If you don't, I'll shoot you."

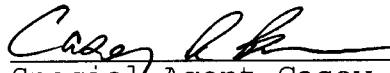
8) xxxx xxxx, Branch Manager, Bank of America, advised that the total loss to Bank of America as a result of the December 5, 2005, robbery was \$3,838.

9) xxxx xxxx, Vice President, Corporate Security Protective Services, Bank of America, 2001 Northeast 46th Street, Kansas City, Missouri, advised that Bank of America is insured by the Federal Deposit Insurance Corporation (FDIC) under insurance number 3510-6, date of charter, July 23, 1999.


10) Based on the foregoing information, your affiant respectfully submits that the foregoing information and evidence indicates that Fanes Romelus, black male, date of birth xx xx, 1973, SSAN xxx-xx-xxxx did willfully, knowingly and unlawfully take by intimidation money from teller Brandi Devore, belonging

to and in the care, custody and possession of the Bank of America.

The forgoing is true and correct to the best of my information and belief.


Special Agent Casey R. Brown
Federal Bureau of Investigation

Subscribed and sworn to before me on this 13th day of December, 2005.


JOHN T. MAUGHMER
Chief United States Magistrate Judge

11:46 a.m.